

MOSER LAW FIRM, PC



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April 4, 2025

VIA ECF

Hon. Arlene R. Lindsay, USMJ
United States District Court, Eastern District of New York
100 Federal Plaza
Central Islip, NY 11717

Re: *Cruz v Demarco Bros Landscaping & Tree Service Corp*,
Case No. 2:23-cv-9200 (GRB)(ARL)

Dear Judge Lindsay:

I represent the Plaintiffs in the above-referenced matter. Please accept this joint status report as directed by the Court's order dated March 4, 2025. With regard to paper discovery, the Defendants amended their Interrogatory Responses and Responses to Document Requests on March 18, 2025. Following a meet and confer, they were amended again on April 3, 2025.

The parties have agreed to stipulate to FLSA coverage, and proposed so-ordered stipulation is annexed hereto.

The parties have also conferred and proposed the following deadlines for completion of discovery:

1. On May 13, 2025 and May 14, 2025 the Defendants will be deposed in person at the offices of the Moser Law Firm, PC. Defendants shall be deposed first.
2. Plaintiffs will be deposed virtually between May 21, 2025 and May 27, 2025.
3. All fact discovery shall be completed on or before July 1, 2025.
4. The parties do not anticipate the need for expert discovery.
5. The deadline to file a dispositive pre-motion letter consistent with Judge Brown's rules is July 31, 2025.

The parties respectfully request that the Court set a date for the final pretrial conference.

Respectfully Submitted,

Steven J. Moser
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CC: All counsel of record via ECF